

Fuller, Fuller & Associates, P.A.
12000 Biscayne Boulevard, Suite 609
North Miami, FL 33181

Invoice submitted to:
Trump Int'l Hotel & Tower & One Central Park West PT Assoc.
1 Central Park West
New York (Manhattan) NY 10023

December 21, 2007

In Reference To:d/b/a: Trump Int'l Hotel & Tower

Invoice #10615

Professional Services

	<u>Hours</u>	<u>Amount</u>
<u>JPF</u>		
8/30/2004 Preparing letter to Mr DiPalma; Preparing letter to Mr Spaluto	0.60	255.00
9/2/2004 Preparing letter to Mr Mikelinich	0.50	212.50
9/7/2004 Preparing letter to co-counsel	0.10	42.50
12/6/2004 Phone conversation with Aaron Sleshinger, Esq. re: Extension of Time; prepared notes to file	0.30	127.50
12/22/2004 Reviewing letter from Brian Blair, phone conversation with Brian Blair, prepared letter to Tilte Co. to obtain a copy of the Condo documents, Reviewing records of NY Finance Dept.	1.50	637.50
12/23/2004 Reviewed Unit owner's Power of Attorney re: tax count 1201; Reviewed Condo documents and outlined same	2.10	892.50
Phone call(s) to Gregory Begg (left msg), Extensive phone conversation with Gregory Begg to discuss Amended Complaint, acceptance of service, general discussions of issues relating to condominium generally prepared letter to Mr. Blair	1.40	595.00
12/29/2004 Extensive phone call(s) to Gregory re: inspection, compromise and amending Complaint, prepared notes to file	0.70	297.50
1/3/2005 Reviewing file in follow-up to discussions with Mr. Begg, Reviewed Trump decision concerning applicable standards, prepared notes to file, Phone call(s) with client, setting parameters of discovery	1.30	552.50

EXHIBIT

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	<u>Hours</u>	<u>Amount</u>
1/4/2005 Reviewed Stipulation for extension of time to Answer, executed same	0.30	127.50
1/7/2005 Conference with L Fuller; Phone call(s) with opposing counsel ; Phone call(s) with client	1.50	637.50
5/5/2005 Conference with Lawrence A. Fuller	0.40	170.00
5/6/2005 Reviewed NY Condo Law	0.70	297.50
5/9/2005 Further review of condominium documents concerning hotels or a transit facility, prepared notes and outline to file	1.40	595.00
6/2/2005 Discussed case and filing of Motion with Larry Fuller	0.25	106.25
11/1/2006 Reviewing Opinion and Order on Motion to Dismiss; discussion with Lawrence A. Fuller regarding same	0.60	255.00
11/13/2006 preparing request for production,request for admissions and interrogatories	1.90	807.50
11/14/2006 Reviewed prior litigation files involving condominium hotels--Fortune House and Atlantic Condominium in regard to the documentation used by hotels to track room useage and other pertinent matters for purpose of discovery	0.70	297.50
11/16/2006 further preparation of request for production and interrogatories	0.50	212.50
12/4/2006 Conference with Lawrence A. Fuller	0.60	255.00
6/13/2007 reviewed and outlined experts reports , reserched ADAAG and Technical Assitance Manual, prepared Memo to to file	5.20	2,210.00
Reviewed Condominium Law in New York regarding the issue of the statutory operator of the condominium, researched New York Jurisprudence on issue of condo statutory and common law operator, reviewed discussion on issue in introduction to condo law, reviewed case law on issue of unincorporated association and application of principal to liability of unit owners as unincorporated association, and Board of Managers	7.40	3,145.00
6/14/2007 conference with Tom Bacon, Larry Fuller to discuss status of matter based on review of documents produced and evaluating outstanding discovery., and findings of experts.Discussions concerning assessment of all operators of rooms and common areas.	1.00	425.00
Reviewed Defendant's Answers to Interrogatories, Prepared Memo to Larry Fuller outlining all parties liable under the ADA operating Trump Tower based on Interrogatory Answers and Condominium Documents produced, reviewed sec'ty of state web site for info on Trump	4.30	1,827.50
further research on issue of liability of owner association and Board of managers	0.90	382.50
Meeting with John P. Fuller , Lawrence A. Fuller and Thomas B. Bacon	1.50	637.50

	<u>Hours</u>	<u>Amount</u>
6/15/2007 Reviewed provisions of condominium documents pertinent to Mr. Levchuck's testimony, prepared e-mail to expert Baez concerning testimony of Mr. Levchuck concerning changes to the disabled rooms	1.30	552.50
reviewed condo floor plans concerning alleged designation of accessible rooms, and changes to room, prepared notes to file	0.40	170.00
phone conversation with Mr. Spalluto regarding availability for deposition	0.20	85.00
6/22/2007 reviewed and modified proposed amended complaint	0.40	170.00
8/27/2007 Travel to and from, and attending conference with Lawrence A. Fuller and expert Baez for deposition	4.00	1,700.00
9/4/2007 research law concerning the burden of proof under alteration standard to prove technical infeasibility under 36.402(maximum extent feasible standard), reviewed ADA Technical Assistance Manual and existing case law on the burden of proof generally in the title III ADA context, prepared Memo to Larry Fuller	4.20	1,785.00
research law of burden of proof on issue of proving technical infeasibility when applying the alteration standard	2.30	977.50
SUBTOTAL:	[50.45	21,441.25]
<u>LAF</u>		
8/9/2004 Phone call(s) with Mr Spalluto regarding lack of accessibility at Trump Hotel	0.40	170.00
8/10/2004 Phone call(s) with Mr DiPallma	0.60	255.00
8/13/2004 Reviewed notes re: ownership; Reviewing pertinent title documents; confirmed proper Defendant; prepared notes to file	0.80	340.00
8/16/2004 Conference with client; reviewing and analyzing expert report and photographs to determine nature and extent of A.D.A. violations and relevant ADAAG citations; researched ADAAG'S	1.60	680.00
Reviewing Condo Unit Deed	0.40	170.00
8/31/2004 Reviewing expert report and prepared Complaint and Summons; Phone call(s) with client, prepared witness and exhibit list.	2.20	935.00
Conference with Mr Spalluto regarding expert report	0.60	255.00
11/9/2004 Reviewing file; phone conversation with Tri-State Judicial Service, Inc. re: status of service, prepared notes to file	0.40	170.00
11/10/2004 Phone call(s) to process server following up on status of service of process, prepared notes to file	0.40	170.00

	<u>Hours</u>	<u>Amount</u>
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11/17/2004	Phone call(s) with Process Server re: Status of Service, Enlargement of Time	0.40	170.00
12/17/2004	Reviewing e-mail to Clerk's office filing Stipulation and Order Extending Time to Answer.	0.20	85.00
12/24/2004	Preparing First Amended Complaint	0.90	382.50
12/28/2004	Reviewing Electronic Mail from Southern District of New York: Re: Set Answer Due Date pursuant to Amended Complaint as to Trump International Hotel & Tower answer due on 1/11/2005.	0.20	85.00
1/4/2005	Phone call(s) with opposing counsel ; Conference with J. Fuller about discussion with Mr Begg	1.00	425.00
1/5/2005	Prepared letter to opposing counsel, prepared proposed report of rule 26f planning meeting with a breakdown of operable dates, prepared rule 26a1 and 26a2 disclosure, prepared certificate of interested persons	2.60	1,105.00
1/6/2005	Reviewing electronic notice on Stipulation and Order Extending Time to Answer Amended Complaint.	0.20	85.00
1/7/2005	Conference with John P. Fuller	0.30	127.50
1/21/2005	Phone call(s) with client ; Phone call(s) with Mr Neff; Preparing letter to opposing counsel	1.00	425.00
1/24/2005	Phone call(s) with opposing counsel ; Reviewing letter from opposing counsel dated 1/20/05; Phone call(s) with client	0.80	340.00
1/25/2005	Preparing letter to opposing counsel; Phone call(s) with Mr DiPalma regarding address information; Telephone call with Mr Dipalma of Access 4 All to confirm information	0.70	297.50
1/26/2005	Preparing letter to opposing counsel ; Phone call(s) with Mr Neff	0.80	340.00
2/1/2005	Research issue of owners liability for units	0.40	170.00
2/8/2005	Phone call(s) with opposing counsel about Report of Planning Meeting ; Preparing letter to Court; Phone call(s) with client	1.30	552.50
2/16/2005	Reviewed Order regarding Telephonic Status Conference and regarding Scheduling Order, prepared instructions to paralegal	0.50	212.50
3/1/2005	Phone call(s) with opposing counsel ; Phone call(s) with client	0.80	340.00
3/3/2005	Reviewing Defendant's proposed status report to Court; Phone call(s) with opposing counsel Preparing revised proposed letter to court; Phone call(s) with client	2.50	1,062.50
3/7/2005	Reviewing letter from opposing counsel to Court; revising letter to Court; Phone call(s) with Judge's law clerk	0.50	212.50

	<u>Hours</u>	<u>Amount</u>
3/9/2005 Reviewing letter from opposing counsel dated 3/9/05; Phone call(s) with client about Defendant's letter to Court	0.50	212.50
3/31/2005 Phone call(s) with opposing counsel ; Phone call(s) with client about staying discover ; Preparing for status conference; Legal research into issue of Defendant's right to stay pending Court's ruling on Motion to dismiss for lack of standing	2.50	1,062.50
4/1/2005 telephonic hearing; Phone call(s) with client to discuss Court's ruling at telephonic hearing	0.80	340.00
4/6/2005 Reviewing Order of 4/4/05; Phone call(s) with client	0.30	127.50
4/27/2005 Preparing Joint Motion To Extend & proposed Order Preparing letter to opposing counsel Reviewing Def's Rule 56.1 Statement of Material Facts	0.70	297.50
4/28/2005 Reviewed Defendant's Motion to dismiss and for Summary judgment; Reviewed Defendant's Rule 56.1; Reviewed cases in Defendant's Motion	2.00	850.00
5/2/2005 Preparing Response to Motion to Dismiss	3.80	1,615.00
5/3/2005 Phone conversation with client for purposes of discussing purpose of trip to NY in order to prepare Affidavit.	0.40	170.00
Researched cases on vexatious litigants; Researched cases on whether exisiting building are liable under ADA	0.75	318.75
5/4/2005 Conference with John P. Fuller to discuss arguments concerning liability for present owner v. original owners, reviewed case law, Phone call(s) with Department of Justice, reviewed Condo documents, Reviewing ADA statute and ADAAG's	2.60	1,105.00
Continuing to Prepare Response to Motion to Dismiss; researched case law on standing; Preparing Plaintiff's Affidavit	3.50	1,487.50
5/5/2005 Reviewing file in preparation of Interrogatories, Requests for Production, and depositions, Reviewing condo docs, prepared notes to file	1.60	680.00
Conference with John Fuller on issue of ADA application to new owner; Preparing response to Motion to Dismiss	3.00	1,275.00
5/10/2005 Phone conversation with Peter Di Palma, prepared Affidavit of Peter Di Palma of Access 4 All, Inc.	0.40	170.00
5/11/2005 Prepared proposed Interrogatories, Requests for Production in regarding the condominium	1.10	467.50
5/24/2005 Reviewing letter from opposing counsel to Clerk; Reviewing Defendant's Third Party Complaint; Phone call(s) with client to discuss Defendant's Third Party Complaint	1.00	425.00

	<u>Hours</u>	<u>Amount</u>
5/24/2005 Pacer Research on newly filed Motions	0.25	106.25
5/25/2005 Reviewed Reply Brief; Researched Law, prepared outline for response	2.80	1,190.00
5/26/2005 Continuing to Review Defendant's Reply Brieg and Legal research	2.00	850.00
5/31/2005 Reviewed Defendant's Reply Brief to Plaintiff's Response to Motion to Dismiss; Reviewed case law; Drafted Response to Defendant's reply brief; Drafted Affidavit for Plaintiff; Phone call(s) with Plaintiff regarding Applicant	3.75	1,593.75
6/9/2005 Pacer search on e-mail received from Court regarding Motion to Extend Time	0.25	106.25
6/21/2005 Phone call(s) with client to update about status	0.40	170.00
8/8/2005 Pacer Research; Reorganized filed downloaded Court documents	1.00	425.00
8/16/2005 Reviewing Third-Party Defendant Architect's Answer to the Third-Party Complaint, Demand for Bill of Particulars; Demand for Names and Addresses of All Witnesses; Notice to Take Deposition upon Oral Examination; Notice for Discovery of Photographs; Notice of Expert Witnesses Pursuant to CPLR Section 3103; Demand for Statements; Demand for Collateral Source Information; Demand for Insurance Information; Demand for Discovery & Inspection to Plaintiffs	2.80	1,190.00
8/17/2005 Phone call(s) with client about discovery from Krieg ; Reviewing Robertson's Rule 7.1 Disclosure, Notice of Deposition, Request for Production & Interrogatories	1.80	765.00
8/18/2005 Reviewing Phillip Johnson's Demand for Names, Demand for Bill of Particulars, Demand for Statements, Notice of Expert Witnesses, Notice of Discovery of Photographs, and Notices of Deposition; Phone call(s) with client	1.80	765.00
Pacer Research on submitted papers; Reviewing of Rule 7.1 Disclosure; Answer to third party complaint; Third party stipulation & order	0.50	212.50
8/19/2005 Preparing letter to opposing counsel; Reviewing Stipulation & Order of 8/5/05; Reviewing Answer to third Party Complaint by Cantor Seinuk Group & Cross Claim Affirmative Defenses; Reviewing Answer to third Party Defendant Phillip Johnson et al. & Cross Claim Affirmative Defenses; Reviewing Answer by Robertson Associates	2.80	1,190.00
8/22/2005 Review Notice of Motion by Third Party Defendant; Review Motion to Dismiss/Memorandum of Law of Third Party Defendant	0.70	297.50
8/29/2005 Reviewing One Central Park's Rule 7.1 Disclosure	0.20	85.00
9/1/2005 Review Second (8-18-05) Notice of Deposition and Duces Tecum List for Deposition Duces Tecum of Trump International Hotel and Tower Condominium, and THIT Commercial, LLC	0.50	212.50
Review Philip Johnson Ritchie & Fiore Architects' Second Rule 7.1 Statement, dated 8-15-05	0.20	85.00

	<u>Hours</u>	<u>Amount</u>
9/7/2005 Review Cantor Seinuk Group, P.C.'s Answer to Third Party Complaint and Crossclaim	0.60	255.00
9/9/2005 Reviewing new third party Defendant filing and file in our internal files	0.25	106.25
10/17/2005 Reviewing Order of 10/12/05; Phone call(s) with client ; Reviewing letter from Mr Begg to Court dated 10/17/05, & exhibits	1.40	595.00
10/18/2005 Reviewing letter from Mr Begg to Court dated 9/19/5; Reviewing letter from Mr Begg to Court dated 10/18/05; Legal research into case law cited by Mr Begg in letter to Court dated 10/18/05; Legal research into case cited by Mr Begg in letter to court dated 9/19/05	4.20	1,785.00
Reviewing Order regarding pretrial conference; Reviewing letter from Defendant , Trump Condo; E-mailed opposing counsel at Trump Condo for copy of correspondence	0.50	212.50
10/20/2005 Reviewing letter from from Mr Winikow to Court dated 10/17/05; Reviewing letter from Mr Carter to Court dated 10/10/05; Reviewing file in preparation for hearing set for 10/21/05; Phone call(s) with client	2.80	1,190.00
10/21/2005 Reviewing letter from opposing counsel to Judge dated 10/21/05; Legal research into case law refered to in letter of Mr Begg dated 10/21/05; telephonic hearing on pending Motion to dismiss third party Complaint	4.00	1,700.00
10/31/2005 Reviewing letter from Mr Winikow to Court dated 10/26/05; Phone call(s) with client regarding Third Party Cpmplaint ; Reviewing Stipulation Extending Time to Respond	0.60	255.00
11/3/2005 Reviewing Order denying Motion to Dismiss; Phone call(s) with client to discuss Order	0.40	170.00
11/4/2005 Pacer research regarding case; Reviewing documents, Motion to Dismiss Order; Reviewing Motion to Dismiss; Disclosure 7.1; filed accordingly	0.50	212.50
11/16/2005 Reviewing Order Extending Time dated 11/7/05	0.20	85.00
11/18/2005 Reviewing Stipulation Extending time of C K Architect; Reviewing Stipulation of Dismissal of Robertson Associates; Phone call(s) with client to discuss Robertson's dismissal	0.60	255.00
11/28/2005 Reviewing letter from Mr Cartier dated 11/23/05, along with proposed Stipulation of Discontinuance; Phone call(s) with client regarding Stipulation	0.40	170.00
11/29/2005 Reviewing letter from Mr Winiknow to Judge dated 11/23/05, along with proposed Stipulation	0.30	127.50
1/6/2006 Reviewing Amended Third Party Complaint	0.70	297.50
1/11/2006 Reviewing Stipulation & Order regarding Cantor Scinuk Group	0.10	42.50

	<u>Hours</u>	<u>Amount</u>
2/20/2006 Reviewing Defendant's / Third party Plaintiff's Brief in Opposition to CK's Motion to Dismiss, and Reviewing cases cited therein; Phone call(s) with client regarding Amended Third Party Complaint	3.20	1,360.00
2/21/2006 Reviewing letter from opposing counsel to Court dated 2/21/06	0.20	85.00
3/1/2006 Phone call(s) with Mr Spalluto regarding Ck's Motion to Dismiss	0.40	170.00
4/2/2006 Phone call(s) with Mr DiPalma regarding pending Motions	0.30	127.50
4/4/2006 Reviewing letter from opposing counsel (Mr Winikow) to Court dated 3/30/06	0.10	42.50
Reviewing Affidavit of Ritchie (architect); Reviewing Memo of Law in Support of Architect's Motion to Dismiss or an Alternative Order of Summary Judgment; Reviewing Krieg's Support of Motion to Dismiss; Reviewing case law cited in Architect's Motion	2.90	1,232.50
4/19/2006 Reviewing Order of 4/5/06	0.30	127.50
5/16/2006 Phone call(s) with client ; Preparing letter to court; Phone call(s) with Mr DiPalma; Reviewing letter from Mr Serkin to Court dated 5/16/05; Reviewing CK Architect's Memo of Law in Support of Motion to dismiss; Legal research of cases cited in CK Architect's Motion to dismiss	3.00	1,275.00
5/30/2006 Reviewing Third party Plaintiff's brief in opposition to CK Architect's Motion to Dismiss; Reviewing Third party Plaintiff's brief in opposition to Phillip Johnson Ritchie & Fiore's Motion to dismiss; Reviewing Certification of Sponsor's Architect	2.80	1,190.00
5/31/2006 Reviewing Brief of Third party Plaintiffs in Opposition to One Central Park West's Motion to Dismiss; Reviewing Condo Offering Plan for Trump International Hotel & Tower; Reviewing exhibits in Opposition to Motion to Dismiss	2.90	1,232.50
6/5/2006 Reviewing note from opposing counsel dated 6/5/06, along with Declarations of Mr Kirkpatrick & Mr Blair, & proposed Order	0.40	170.00
6/12/2006 Phone call(s) with Mr DiPalma concerning updated status	0.40	170.00
6/13/2006 Reviewing letter from Mr Krieg to Court dated 6/13/06; Reviewing letter from Mr Winikow to court dated 6/13/06; Phone call(s) with client	0.60	255.00
6/21/2006 Reviewing detailed letter with citations and legal argument, dated June 20, 2006 to Judge Karas from attorney Gregory Begg. Researching/reviewing legal citation.	0.80	340.00
6/22/2006 Reviewing Scott Winikow's letter to Judge Karas; Reviewing Reply Memorandum of Law in Support of CK Architect, P.C.'s Motion to Dismiss, or in the Alternative, For an Order of Summary Judgment; Reply Affidavit of Scott Winikow; Complaint of Case 01 of 5518 Disabled in Action v. Trump; Amended Third Party Complaint; Transcript of May 24, 2006 hearing before Hon. Richard Holwell in Disabled in Action v. Trump International; Reviewing Order dated May 24, 2006 granting CK Architect, P.C. and Philip Johnson Ritchie & Fiore	3.20	1,360.00

		<u>Hours</u>	<u>Amount</u>
	Architects' Joint Motion to Dismiss in Disabled in Action v. Trump International; multiple Certificates of Occupancy; Section of contractual document describing the effect of Certificate of Occupancy		
6/22/2006	Reviewing letter from opposing counsel Mr. Begg to Court dated 6/20/06.	0.30	127.50
	Phone call(s) with client regarding status of Third Party Cimplaint	0.40	170.00
6/23/2006	Reviewing First Motion to Dismiss Amended Third Complaint filed by C. K. Architect; Reviewing First Motion to Dismiss Affidavit of Winikow; Reviewing First Motion to Dismiss by C.K. Architect; Reviewing Motion to Dismiss Amended Third Party Complaint by One Central Park.	3.20	1,360.00
6/27/2006	Reviewing letter from opposing counsel dated Mr. Winikow to Court dated 6/22/06; Reviewing letter from opposing counsel dated from Mr. Winikow to all counsel; Reviewing Order of 6/26/06; Reviewing cases cited in letter of Mr. Winikow to Court dated 6/22/06.	1.20	510.00
7/6/2006	Reviewing Supplemental Memo of Law of Architect dated 7/5/06; Preparing letter to Court; Phone call(s) with client; Phone call(s) with Mr. Di Palma; Reviewing Defendant Trump's Motion to Dismiss.	4.50	1,912.50
7/7/2006	Phone call(s) with client concerning Affidavit; Prepared Affidavit for Mr. Spalluto; Preparing letter to client.	1.20	510.00
	Reviewing Supplemental Reply Memo to of Phillip Johnson Architects dated 7/6/06.	0.30	127.50
7/10/2006	Reviewing letter dated 7-5-06 from Scott Winikow, counsel to Third-Party defendant CK Architect, P.C. to the Honorable Kenneth Motion. Karas; Reviewing Supplemental Memorandum of Law in Further Support of CK Architect, P.C.'s Motion; Reviewing authorities cited therein	1.00	425.00
7/12/2006	Letter of Mr. Begg to Court dated 7/12/06; Letter of Mr. Winikkowo to Court dated 7/12/06; Letter of Mr. Krieg to Court dated 6/30/06 & approved by Court for 7/10/06; Reviewing Trump's Brief in Opposition to CK Architects & Phillip Johnson's Supplemental Memo to of Law; Reviewing Case law cited in Trump's Brief of 7/12/06.	2.60	1,105.00
7/14/2006	Phone call(s) with Mr Reisman	0.20	85.00
7/24/2006	Phone call(s) with Judge's assistant, Joy; Phone call(s) with client	0.60	255.00
7/26/2006	Reviewing letter from opposing counsel to Court dated 7/26/06; Reviewing case law referred to by Defendant in letter to Court dated 7/26/06	1.00	425.00
8/1/2006	Reviewing letter from Mr Winikow dated 8/1/06	0.10	42.50
8/3/2006	Phone call(s) with Mr Blair; Preparing letter to Mr Blair; Phone call(s) with Mr Spalluto	1.50	637.50

	<u>Hours</u>	<u>Amount</u>
8/11/2006 Reviewing Oder dated 9-9-06	0.20	85.00
9/29/2006 Reviewing file in preparation for oral argument set for 10/06/06 on Defendant's Motion to Dismiss; Phone call(s) with client.	2.00	850.00
10/3/2006 Reviewing case law on issue of standing (in Preparation for hearing set for 10/6/06	2.50	1,062.50
Phone call(s) with Mr DiPalma as to status of case	0.30	127.50
Phone call(s) with client as to status of case	0.50	212.50
10/4/2006 Preparing for 10/6/06 Hearing on Defendant's Motion for Summary Judgment; Phone call(s) with client	3.00	1,275.00
10/5/2006 Reviewing 56 page law review article dealing with ADA standing; Reviewing Affidavit filed by Defendant in support of Defendant's Motion for Summary Judgment	3.20	1,360.00
10/6/2006 Attending hearing; post hearing telephonic conference with Mr Spalluto to discuss hearing; Phone call(s) with Mr DiPalma	4.80	2,040.00
10/9/2006 Preparing letter to opposing counsel	0.80	340.00
Reviewing Case of Bldg & Construction Trades v. Downtown Development, referred to by Judge at hearing on 10/6/06	0.50	212.50
11/1/2006 Reviewing Opinion of 10/12/06; Phone call(s) with client to discuss opinion of 10/12/06; Preparing letter to client	3.50	1,487.50
11/2/2006 Preparing Request for Production ; Phone call(s) with client ; Preparing Request for Admissions	3.50	1,487.50
Preparing letter to Court	0.60	255.00
11/3/2006 Continuing to make changes to discovery documents to propound to Defendant's ; Preparing Notice of deposition of Defendant	2.50	1,062.50
11/7/2006 Reviewing letter from Mr Serkin to Court dated 11/7/06; Reviewing letter from opposing counsel to Mr Fuller dated 11/7/06; Phone call(s) with Mr Spalluto	0.80	340.00
11/8/2006 phone conversation with Pablo Baez regarding items needed by expert that should be requested from Def.	0.30	127.50
11/9/2006 further review of condominium documents for purpose of preparing request for production, request for admissions, and interrogatories, prepared outline of pertinent provisions	1.50	637.50
11/10/2006 reviewed ADAAG guidelines concerning issue of whether new construction and/or alteration standards apply and reviewed Title III in reference thereto	0.70	297.50

	<u>Hours</u>	<u>Amount</u>
11/13/2006 Conference with client advising of impasse and status	1.20	510.00
11/15/2006 Phone call(s) with Judge's clerk	0.30	127.50
11/17/2006 Reviewing Trump Unit Owners Power of Attorney; Reviewing Trump Declarations Establishing A Plan for Condo Ownership; Reviewing By Laws of Trump International Hotel and Condo	5.00	2,125.00
11/20/2006 Making final revisions to Interrogatories; Request for Production and Request for Admissions	2.50	1,062.50
Reviewing letter from Mr Winikow to court	0.30	127.50
Prepared Memo to to file regarding liability of condo assoc by virtue of condo documents	1.00	425.00
11/21/2006 Reviewing E-mail from opposing counsel dated 11/21/06	0.20	85.00
Phone call(s) with opposing counsel (Mr Begg)	0.50	212.50
11/27/2006 Reviewing letter from opposing counsel dated 11/27/06; Reviewing letter from opposing counsel dated 11/7/06; Reviewing E-mail from Mr Blair dated 11/22/06 and 11/27/06; Preparing reply to Mr Blair	0.80	340.00
11/28/2006 Reviewing letter from Attorney Krieg to Court dated 11/22/06	0.20	85.00
Conference with Mr Spalluto	0.50	212.50
Phone call(s) with Judge Pittman's clerk; Preparing letter to all counsel to advise of status conference	0.70	297.50
12/4/2006 Conference with John P. Fuller regarding impasse with d0 and Third Party Defendant's	0.60	255.00
12/11/2006 Preparing letter to Judge Pitman	1.20	510.00
12/13/2006 Reviewing Order of 12/5/06	0.20	85.00
12/14/2006 Reviewing letter from Mr Winikow dated 12/13/06; Preparing letter to Court in response to letter of Mr Winikow	1.80	765.00
Reviewing Amended Order of 12/7/09	0.20	85.00
12/19/2006 Reviewing file in Preparation for hearing before Magistrate Pittman	1.50	637.50
12/21/2006 Telephonic conference with Judge Pittman and all counsel	0.70	297.50
Phone call(s) with Mr Spalluto to discuss what transpired at telephone conference with Court	0.40	170.00
12/26/2006 Conference with client	0.80	340.00

	<u>Hours</u>	<u>Amount</u>
12/26/2006 Preparing E-mail to Mr Begg	0.10	42.50
1/10/2007 Preparing E-mail to opposing counsel	0.30	127.50
1/12/2007 Phone call(s) with Mr Serkin	0.50	212.50
1/18/2007 Reviewing file in Preparing for hearing for 1/19/07; Phone call(s) with client	0.80	340.00
1/19/2007 Telephonic status conference with Magistrate Judge Pittman and all counsel	0.70	297.50
1/30/2007 Reviewing Order of 1/19/07, along with Proceedings of Judge Pittman	0.30	127.50
Phone call(s) with Mr Spalluto about results of Hearing on 1/19/07	0.40	170.00
1/31/2007 Preparing letter to opposing counsel	0.70	297.50
2/2/2007 Hearing on pending Third Party Motions to Dismiss	1.00	425.00
2/5/2007 Phone call(s) with opposing counsel (left message for Mr Begg); Preparing E-mail to opposing counsel	0.40	170.00
2/9/2007 Revising Request for Production	0.50	212.50
Phone call(s) with client	0.40	170.00
2/13/2007 Preparing letter to Magistrate Pittman	1.00	425.00
2/20/2007 Phone call(s) with Judge Pittman's clerk	0.20	85.00
2/21/2007 Reviewing exhibits 1-13 to Trump's Brief in Opposition to One Central Park West Motion to Dismiss; Reviewing letter from Mr Reiss to Mr Hughes dated 3/3/03; Reviewing Purchase Agreement	1.80	765.00
2/27/2007 Telephonic status conference with Magistrate Judge Pittman	0.60	255.00
Preparing letter to opposing counsel	0.70	297.50
Phone call(s) with client	0.30	127.50
2/28/2007 Reading Opinion and Order of 2/26/07	1.50	637.50
3/1/2007 Reviewing letter from Mr Winikow dated 2/28/07	0.20	85.00
3/2/2007 Reviewing Order of 3/1/07	0.30	127.50
3/9/2007 Phone call(s) with client	0.30	127.50
Phone call(s) with opposing counsel's secretary Rita (.3 hours); telephonic conference with client (1.0 hours)	1.30	552.50
Phone call(s) with opposing counsel	0.70	297.50

	<u>Hours</u>	<u>Amount</u>
3/9/2007 Reviewing Reviewed notes re: ownership; Reviewing pertinent title documents; confirmed proper Defendant; prepared notes to file party Defendant 1, Central Park West's Answer and Defenses to Amended Reviewed notes re: ownership; Reviewing pertinent title documents; confirmed proper Defendant; prepared notes to file Party Complaint	0.80	340.00
3/14/2007 Preparing letter to Court (1.5) ; Phone call(s) with client (.5)	2.00	850.00
3/16/2007 Phone call(s) with Mr Ortiz (Court clerk); Phone call(s) with opposing counsel's secretary, Rita	0.30	127.50
3/19/2007 Phone call(s) with Ms Conley, assistant to Mr Blair	0.40	170.00
Reviewing E-mail from Mr Blaber; Reviewing Stipulation for Substitution of Counsel; Reviewing Declaration of Mr Blair	0.40	170.00
3/20/2007 Reviewing file in Preparing for telephonic hearing before the Court set for 3/21/07	0.70	297.50
3/21/2007 Telephonic conference with Court and opposing counsel	0.80	340.00
Phone call(s) with client to advise of Court ruling at today's status conference	0.30	127.50
3/22/2007 Reviewing Notice of Appearance of Jeanine Conley for One Central Park West	0.10	42.50
3/26/2007 Preparing letter to opposing counsel ; Reviewing Order entered on 3/26/07; Reviewing letter from opposing counsel dated 3/26/07	1.00	425.00
3/30/2007 Reviewing letter dated 3-27-07 from Daniel Ortiz, courtroom deputy to Magistrate Judge Henry Pittman; reviewing Judge Pittman's settlement procedures	0.50	212.50
4/2/2007 Phone call(s) with Mr Baez	0.40	170.00
4/4/2007 Travel to and from and attending conference with Mr Spalluto to answer interrogatories and comply with Request for Production	3.50	1,487.50
Reviewing Order of 3/30/07; Phone call(s) with opposing counsel (Mr Blair) (left message); Phone call(s) with opposing counsel (Mr Begg) (left message); Phone call(s) with Mr Beggs's secretary, Rita	0.60	255.00
4/5/2007 Reviewing Defendant's Answers to interrogatories; Reviewing Defendant's Answers to Request for Production	2.00	850.00
Phone call(s) with Mr Begg's secretary; Phone call(s) with Mr Blair's secretary	0.50	212.50
Reviewing letter from Mr Merson dated 4/4/07; Preparing letter to opposing counsel ; Reviewing letter from Mr Blair dated 4/5/07, along with One Central Park's Notice of Deposition; Phone call(s) with Mr Blair's secretary	2.60	1,105.00
Preparing letter to opposing counsel (.6); Preparing Renotice of Deposition of Defendant (.2); Phone call(s) with Mr Blair's secretary (.2)	1.00	425.00

	<u>Hours</u>	<u>Amount</u>
4/6/2007 Reviewing letter from opposing counsel dated 4/6/07	0.20	85.00
4/9/2007 Preparing letter to Magistrate Judge	1.00	425.00
4/10/2007 Phone call(s) with opposing counsel (left message); Phone call(s) with opposing counsel's secretary	0.60	255.00
Phone call(s) with Mr Merson regarding Defendant's objection to discovery request	0.70	297.50
4/11/2007 Reviewing E-mail from opposing counsel	0.20	85.00
4/12/2007 Reviewing letter from Ms Conley to Court dated 4/10/07; Reviewing Third Party Defendant's Notice of Request of Entry set for 5/15/07	0.40	170.00
4/13/2007 reviewed letter from Brian Blair, Esq, prepared response thereto with requested information	0.30	127.50
Reviewing letter from Mr Blair to Mr Merson dated 4/12/07; Preparing E-mail reply to Mr Merson regarding reviewing documents	0.40	170.00
4/20/2007 Reviewing Trump's Amended and Restated Offering Plan; Reviewing Special Risks to be Considered by Purchasers (184 pages; Reviewing Description of Hotel Units, Tower Units and Common Elements; Reviewing Management Agreement, Hotel Management Agreement and Contracts	4.80	2,040.00
4/21/2007 Reviewing 17 page Purchase Agreement (Exhibit 1); Reviewing Exhibits 1-12, including Power of Attorney, Form of Unit Deed, Floor Plans and Hotel Unit Maintenance and Operating Agreement; Reviewing Declaration of Condominium	4.20	1,785.00
4/22/2007 Reviewing By Laws of Trump International Hotel (63 pages); Reviewing Rules and Regulations of Trump International Hotel; Reviewing Hotel Unit Maintenance and Operation Agreement of Trump International Hotel	3.90	1,657.50
4/23/2007 Reviewing 45 pages of Evacuation Procedures, Fire Procedures, Fire Safety Plan of Trump International Hotel, and Safety Tips for Hotel Guests	3.10	1,317.50
Reviewing file in Preparing for deposition of Defendant ; Reviewing Defendant's Answer and Affirmative Defenses; Phone call(s) with client regarding upcoming deposition ; Preparing questions to ask during deposition of Defendant set for 4/25/07	3.20	1,360.00
4/25/2007 Attending deposition of Mr Levchuck in Levine v. Trump; Attending deposition of Mr Levchuck in Spalluto v. Trump	7.50	3,187.50
Return travel to Miami	5.00	2,125.00
4/26/2007 Conference with Mr Spalluto to discuss deposition testimony of Trump representative, Mr Levchuck	0.60	255.00

	<u>Hours</u>	<u>Amount</u>
4/26/2007 Preparing notes of deposition of Mr Levchuck	0.70	297.50
starting to draft Motion for Summary Judgment	3.50	1,487.50
4/27/2007 Conference with Mr Spalluto regarding his proposed answers to interrogatories propounded by Defendant; Preparing final draft pf answers to interrogatories; Preparing E-mail to client	3.00	1,275.00
5/2/2007 Reviewing E-mail from Mr Merson; Preparing E-mail reply to Mr Merson	0.40	170.00
5/8/2007 Reviewing letter from Mr Blair to Mr Begg dated 5/8/07; Phone call(s) with Mr Blair's secretary	0.40	170.00
5/11/2007 Reviewing E-mail from Mr Blair's secretary; Reviewing letter from Mr Blair dated 5/11/07; Phone call(s) with opposing counsel (left message for Mr Blair); Preparing E-mail to Mr Begg and Mr Blair	0.80	340.00
Phone call(s) with opposing counsel (Mr Blair)	0.40	170.00
5/29/2007 Phone call(s) with Mr Begg	0.40	170.00
6/13/2007 research on condominium law in new york on liability of an unincorporated association under new york condo law and case law	2.00	850.00
further preparation of Summary Judgment Motion	1.10	467.50
6/14/2007 Conference with attorneys Thomas B. Bacon , John P. Fuller and Lawrence A. Fuller to discuss discovery and status if case	1.50	637.50
6/15/2007 Preparing letter to opposing counsel (.3) ; Phone call(s) with client (.3)	0.60	255.00
6/16/2007 Preparing letter to Judge Pitman; Reviewing outling transcript of deposition of Defendant	2.20	935.00
6/18/2007 Preparing letter to opposing counsel	0.50	212.50
Making revisions in letter to Magistrate Judge Pitman; Preparing Second Amend Complaint	2.80	1,190.00
6/26/2007 Preparing Notice of Deposition of Defendant's acting general manager; Preparing letter to opposing counsel.	0.70	297.50
6/27/2007 Dictation, correction and review of Notice of Deposition Duces Tecum of Suzie Mills	0.50	212.50
6/30/2007 Reviewing 26 page report of Ms Soy Williams; Reviewing letter from Mr Lovettl dated 6/29/07, along with 6 page resume	2.50	1,062.50
7/3/2007 Reviewing Notice of Third party's compliance dated 7/2/07	0.40	170.00
Reviewing Note of Appearance of Mr. Merson.	0.10	42.50

	<u>Hours</u>	<u>Amount</u>
7/3/2007 Phone call(s) with opposing counsel (Mr. Merson).	0.40	170.00
Phone call(s) with opposing counsel (Mr. Beggs and Merson).	0.70	297.50
7/7/2007 Reviewing file in preparation for Hearing set for 7/13/07.	2.50	1,062.50
7/13/2007 Telephonic hearing with Judge Pittman	1.10	467.50
Reviewing letter from opposing counsel dated 7/10/07; Reviewing Defendant's Notice of Deposition of Plaintiff	0.30	127.50
Reviewing file in Preparing for hearing on 7/13/07; Phone call(s) with Ms Conley	1.00	425.00
reviewed prior decision in other ADA case against Condo Assoc reference ADAAG standard applicable	0.20	85.00
Conference with Pablo Baez to discuss inspection report of Soy Williams	0.60	255.00
7/14/2007 Drafting Motion for Leave to Add Additional Party Defendant's	1.80	765.00
7/18/2007 Phone call(s) with client ; Phone call(s) with opposing counsel (left message for Mr Merson)	0.50	212.50
7/19/2007 Phone call(s) with opposing counsel (left message)	0.10	42.50
Phone call(s) with Mr Merson; Phone call(s) with Mr Blairs's secretary; Preparing E-mail to Mr Merson; Preparing E-mail to Mr Spalluto	0.70	297.50
7/21/2007 Further review of reports of Mr. Black & Ms. Williams in preparation for deposition of Defendant set for 7/25/07; Reviewing transcript of Deposition of Mr. Levchuck.	2.90	1,232.50
7/23/2007 Preparing letter to Court	0.40	170.00
Traveling to and from, and attending conference with client to prepare for Deposition set for 7/26/07.	3.50	1,487.50
Conference with Mr Baez regarding contents of his rebuttal report	1.80	765.00
7/25/2007 Preparing for and Traveling to and taking of deposition of S. Mills.	8.50	3,612.50
7/26/2007 Attending deposition of Mr. Spalluto.	3.50	1,487.50
Traveling from depositions in New York City back to Florida.	3.50	1,487.50
7/27/2007 Reviewing letter from Mr. Blair to Mr. Begg dated 7/26/07, along with 22 page Interrogatories and 16 page Request for Production to Defendant.	3.20	1,360.00
Preparing letter to Mr. Begg.	0.60	255.00
7/28/2007 Reviewing Defendant's Response to Motion to Amend	0.60	255.00

	<u>Hours</u>	<u>Amount</u>
7/30/2007 Preparing Interrogatories ; Preparing Request for Production ; Phone call(s) with Mr Spalluto; Reviewing letter from opposing counsel to Judge Pittman dated 7/27/07	2.30	977.50
7/31/2007 Reviewing letter from opposing counsel dated 7/27/07, along with Condo Management Agreement and checks, pursuant to Court Order	1.70	722.50
Preparing letter to Court	0.50	212.50
8/2/2007 Three additional telephone conversations with opposing counsels' assistants, preparation of two additional e-mails, regarding resetting Scheduling Conference per Judge's instructions.	0.80	340.00
8/8/2007 Phone call(s) with Mr Kopelson (.6)	0.60	255.00
Phone call(s) with Judge Pitman's clerk (.1); Preparing letter to opposing counsel (.7); Phone call(s) with client to advise of date and time for settlement conference (.2)	1.00	425.00
8/10/2007 Preparing Notice of Filing; Reviewing letter from opposing counsel, Kopelson	0.70	297.50
Phone call(s) with Mr Baez to discuss reports of Mr Black and Ms Williams	0.60	255.00
8/13/2007 Reviewing letter from Mr Blair dated 5/13/07 (.3); Phone call(s) with Mr Baez (.2)	0.50	212.50
Reviewing rebuttal report of Mr Baez	2.00	850.00
8/14/2007 Reviewing E-mail from Mr Merson dated 8/13/07; Phone call(s) with Mr Blair regarding setting depositions dates and times of experts	0.50	212.50
Phone call(s) with client (.2) ; Phone call(s) with Mr Kopelson (.5)	0.70	297.50
8/15/2007 Reviewing letter from Mr Blair dated 8/14/07	0.40	170.00
8/18/2007 Reviewing letter from Mr Merson dated 8/15/07 regarding stipulation to deposition transcript; Preparing reply to letter from Mr Merson	0.40	170.00
Reviewing letter from Mr Merson to Judge Pittman dated 8/15/07	0.30	127.50
Preparing E-mail to opposing counsel	0.30	127.50
8/21/2007 Phone call(s) with Mr Merson (.3); Phone call(s) with Mr Baez (.5); Phone call(s) with Access Board (.5); Preparing Notice of deposition of Ms Williams (.4); Preparing Notice of deposition of Mr Black (.4)	2.10	892.50
8/26/2007 Preparing for depositions of Black and Williams; Preparing direct examination of experts	3.80	1,615.00
8/27/2007 Travel to and from and attending Conference with John P. Fuller and Mr Baez	4.00	1,700.00

	<u>Hours</u>	<u>Amount</u>
8/27/2007 Reviewing Third party Defendant's answers to interrogatories from Defendant Trump (.8); Reviewing Amended Re-Notice of Deposition of Mr Weiss (.2); Preparing E-mail to opposing counsel regarding change of date and time of deposition of Mr Weiss (.2)	1.20	510.00
8/28/2007 Reviewing E-mail from Mr Blair dated 8/28/07 (.2); responding to E-mail of mr Blair (.2); Reviewing 54 page report of Mr Terry in companion Trump case (2.8)	3.20	1,360.00
Reviewing 1 Central Park West's Responses and Objections to Trump Request for Production	0.40	170.00
8/29/2007 Preparing for and taking deposition of Ms Williams	6.00	2,550.00
8/30/2007 Attending predeposition conference, and deposition of Mr Baez	6.70	2,847.50
8/31/2007 Preparing for deposition of Defendant's expert (4.0); Taking deposition of Defendant's expert (3.8); Preparing for and Attending deposition of Mr Weiss (2.0); Traveling back to Florida (5.0)	14.80	6,290.00
9/2/2007 Preparing letter to Mr Blair	0.50	212.50
9/4/2007 Preparing letter to opposing counsel ; Preparing proposed consent Decree; Preparing letter to Court	2.00	850.00
9/5/2007 Anticipated time to Prepare for, Travel to and from and Attend Settlement Conference on 9/11/07 (10 hours); Anticipated time to Review outstanding discovery due from Defendant (2.5 hours)	12.50	5,312.50
9/7/2007 Preparing E-mail to opposing counsel	0.20	85.00
9/10/2007 Preparing for settlement conference set for 9/11/07	2.50	1,062.50
Traveling to New York City for settlement conference on 9/11/07	4.50	1,912.50
Telephonic presettlement conference with client	0.50	212.50
9/11/2007 Attending settlement conference with Judge Pitman	3.00	1,275.00
Traveling from New York City to office in Florida	4.50	1,912.50
9/12/2007 Phone call(s) with Mr Blair's secretary	0.10	42.50
9/14/2007 Phone call(s) with Mr Blair (.4); Phone call(s) with Mr Begg (.3)	0.70	297.50
9/15/2007 Reviewing letter from opposing counsel dated 8/21/07 (.2); Reviewing transcript of deposition of Mr Lechuck taken in Levine v. Trump on 6/21/07 (.8); Reviewing 109 page transcript of deposition of Mr filon (2.8)	3.80	1,615.00
9/16/2007 Reviewing 41 page transcript of Ms Talenik taken in Levine v. Trump (1.2); Reviewing 213 page transcript of deposition of Mr Levchuck taken on 4/25/07 in Levine v. Trump (2.3)	3.50	1,487.50

	<u>Hours</u>	<u>Amount</u>
9/17/2007 Phone call(s) with Judge Pitman's lawclerk (.2); Phone call(s) with Mr Spalluto regarding status of settlement (.4)	0.60	255.00
Reviewing 137 page transcript of deposition of Mr Hughes taken in Levine v. Trump on 4/26/07 (2.7); Reviewing deposition of Mr Reiss taken on 4/23/07 (.5)	3.20	1,360.00
9/18/2007 Phone call(s) with Ms Conley	0.30	127.50
Reviewing 1 Central Park West's Notice of Motion to Compel (.2); Reviewing Declaration of Ms Conley in Support of 1 Central Park West's Motion to Compel and exhibits attached (.8); Reviewing letter from Ms Conley to Court dated 9/17/07 (.4); Reviewing proposed Order granting Motion to Compel (.2)	1.60	680.00
Dictating letter to opposing counsel	0.70	297.50
9/19/2007 Phone call(s) with Judge Pitman's clerk (.1); Reviewing letter from Mr Begg to Judge Pitman dated 9/19/07 (.3)	0.40	170.00
10/2/2007 Phone call(s) with Judge's clerk; Preparing letter to Judge	1.00	425.00
10/3/2007 Preparing E-mail to opposing counsel (.1); Preparing E-mail to Mr Koppelson (.1)	0.20	85.00
10/5/2007 Phone call(s) with client regarding status of settlement discussions	0.30	127.50
10/9/2007 Preparing letter to Court	0.60	255.00
10/17/2007 Phone call(s) with Judge Pitman's lawclerk	0.20	85.00
10/26/2007 Phone call(s) with Mr Blair	0.20	85.00
10/30/2007 Phone call(s) with Ms Conley (.3); Phone call(s) with opposing counsel's (Begg's secretary Rita) (.1); Preparing letter to Mr Begg (.8)	1.20	510.00
11/5/2007 Phone call(s) with Mr Blair (.3); Reviewing letter from Ms Conley dated 11/1/07 (.3); Preparing E-mail to opposing counsel regarding error in date of earlier letter (.2)	0.80	340.00
Preparing letter to Court	0.50	212.50
11/7/2007 Phone call(s) with Mr Merson	0.40	170.00
11/13/2007 Phone call(s) with Ms Conley (.4); Phone call(s) with opposing counsel (Mr Merson) (.3); Reviewing file in preparation for phone conference (.7); telephonic settlement conference with Court (.2)	1.60	680.00
11/15/2007 Phone call(s) with Mr Merson	0.40	170.00
Reviewing letter from opposing counsel (Mr Begg) to Court (.3)	0.30	127.50

	<u>Hours</u>	<u>Amount</u>
11/20/2007 Phone call(s) with opposing counsel (Mr Begg) (.3); Preparing proposed Final Order (.3); Preparing letter to Judge (.6); Phone call(s) with Mr Begg (.4); telephonic conference with Court (.4)	2.00	850.00
Preparing letter to Mr Begg with modified Consent Decree as requested by Mr Begg (.6); Phone call(s) with client (.4); Preparing E-mail to opposing counsel with suggested briefing schedule (.2)	1.20	510.00
11/28/2007 Phone call(s) with opposing counsel's secretary Rita (.3); Preparing E-mail to Mr Begg inquiring into status of Defendant's signing of Consent Decree (.3); Phone call(s) with Mr Begg and Rita (.4)	1.00	425.00
12/3/2007 Preparing letter to opposing counsel concerning briefing schedule	0.30	127.50
Reviewing letter from Mr Begg to Court dated 11/30/07	0.40	170.00
12/4/2007 Reviewing letter from Mr Merson dated 12/4/07 (.3); Preparing letter to Court (.4)	0.70	297.50
12/11/2007 Starting to Prepare Application for Fees	3.00	1,275.00
12/12/2007 Continuing to work on Plaintiff's Application for Fees and Costs	2.80	1,190.00
12/13/2007 Reviewing letter from Mr Blair to Judge Pitman dated 12/12/07, along with pages of deposition transcripts	0.50	212.50
Conference with Thomas B. Bacon regarding additional case law to refer to in application for fees and costs	0.50	212.50
Additional work on Application for Fees and Costs; listing and describing results obtained	5.00	2,125.00
12/17/2007 Preparing argument supporting expert fees and cost	2.30	977.50
SUBTOTAL:	[438.05	186,171.25]
<u>TBB</u>		
3/28/2007 Reviewing letter from opposing counsel regarding inspection date and time	0.20	70.00
Drafted revised Rule 34 inspection; Preparing letter to opposing counsel	0.70	245.00
Call with opposing counsel regarding inspection.	0.50	175.00
3/30/2007 Review Order [DE 126], notes to file.	0.40	140.00
Prepared Pro Hac Vice application for Thomas B. Bacon.	0.60	210.00
4/3/2007 Reviewing file in Preparing for Phone call(s) to opposing counsel	0.10	35.00

	<u>Hours</u>	<u>Amount</u>
4/3/2007 Phone call(s) with opposing counsel' assistant confirming inspection; note to file	0.20	70.00
4/4/2007 Reviewing letter from opposing counsel regarding scope of inspection	0.40	140.00
Reviewing file and conference with Lawrence A. Fuller regarding scope of inspection	0.50	175.00
Preparing E-mail to opposing counsel regarding inspection	0.40	140.00
4/5/2007 Call with expert regarding inspection.	0.20	70.00
Review of file in preparation for inspection.	1.90	665.00
4/10/2007 Call with opposing counsel regarding inspection.	2.00	700.00
4/11/2007 Meeting with expert before and after inspection, attend inspection of facility.	2.60	910.00
Travel to and from NYC (7 hours divided by 5 files).	1.00	350.00
Local travel to and from facility.	1.00	350.00
4/25/2007 Phone call(s) with Mr Spalluto regarding inspection	0.80	280.00
Drafted responses to interrogatories; Reviewing file regarding information sought	3.40	1,190.00
Drafted responses to requests for production of documents; Reviewing file to gather documents	2.90	1,015.00
5/11/2007 Reviewing file in Preparing for inspection	1.60	560.00
5/15/2007 Travel to New York City for Inspection (6 hours divided by 2 files)	3.00	1,050.00
Time set aside for cancelled inspection after traveling to New York City for scheduled inspection	4.00	1,400.00
5/24/2007 2 Phone call(s) with co-counsel regarding coverage of inspection	0.30	105.00
E-mail to opposing counsel regarding inspection details	0.30	105.00
E-mail to opposing counsel regarding attendance at inspection	0.20	70.00
5/29/2007 Drafted Motion for Summary Judgment	0.70	245.00
Drafted brief in support of Summary Judgment	0.70	245.00
Drafted affidavit of Peter Spalluto	0.50	175.00
Drafted statement of facts	0.90	315.00
5/30/2007 E-mail to opposing counsel regarding Plaintiffs' do not waive claims regarding restaurant	0.20	70.00

	<u>Hours</u>	<u>Amount</u>
5/30/2007 Phone call(s) with Mr Spalluto regarding revisions to affidavit	0.40	140.00
Revised and drafted Mr Spalluto's affidavit	0.60	210.00
Reviewing deposition of Michael Levchuck	0.80	280.00
Drafted statement of material facts	4.60	1,610.00
Drafted affidavit of Mr Baez	1.60	560.00
5/31/2007 Phone call(s) with expert regarding affidavit	0.20	70.00
Review report of Defendant's expert and comparison to report of Pablo Baez.	1.50	525.00
Drafted and revised Motion for Summary Judgment.	0.80	280.00
Drafted and revised statement of material facts.	0.80	280.00
Drafted and revised brief in support of summary judgment.	4.30	1,505.00
Research 42 U.S.C. Section 12183 pertaining to new construction.	0.70	245.00
Drafted and revised affidavit of Peter Spalluto.	0.30	105.00
6/7/2007 Final preparation of brief, motion, exhibits, affidavits, statement of facts for filing (filing of document postponed)	0.80	280.00
6/14/2007 Conference with John P. Fuller, Lawrence A. Fuller and Thomas B. Bacon to discuss whether to proceed to file summary judgment	1.50	525.00
6/18/2007 Research waiver of privilege of expert report disclosed to third party.	2.10	735.00
7/13/2007 Research cases regarding waiver of attorney work product privilege for documents disclosed to third party.	1.90	665.00
Review Court Order dated July 16, notes to file.	0.30	105.00
Drafted letter brief regarding waiver of work product privilege.	2.90	1,015.00
7/17/2007 Revised letter brief.	1.20	420.00
7/18/2007 Review Federal Rules of Civil Procedure regarding amendment of Pleadings.	0.30	105.00
Revised Motion to Amend.	0.70	245.00
7/23/2007 Review file regarding Deposition date and time.	0.20	70.00
Correspondence to client regarding Deposition.	0.20	70.00
7/30/2007 Review letter brief submitted by Defendant, notes to file.	0.60	210.00

	<u>Hours</u>	<u>Amount</u>
7/31/2007 Revised Supplemental Rule 26 Expert Disclosure.	0.60	210.00
12/13/2007 Meeting with Lawrence A. Fuller regarding brief	0.50	175.00
12/14/2007 Preparing summary of time and labor required	1.50	525.00
Edited fee application.	0.90	315.00
 SUBTOTAL:	 [65.00	 22,750.00]
<u>Z-Paralegal</u>		
8/11/2004 Reviewing file; Reviewed information from the county property appraisers office; prepared computer look up to identify proper codes to search to determine current property owner; reviewed print-out; ordered relevant title documents; organized documents to identify owner; prepared notes to file	0.90	103.50
8/14/2004 Prepared Pacer search and status search on owner	0.70	80.50
12/8/2004 Reviewing file to determine date of service. Phone call(s) with Process Server to determine the status of Service on the file. Phone call(s) with Co-Counsel Mario Mikelinich with regard to status of service.	0.60	69.00
12/10/2004 Reviewing and updating file. Preparing Letter and Attachments regarding Electronic Filing.	0.50	57.50
6/15/2005 Preparing letter to opposing counsel Begg regarding third party complaint	0.40	46.00
8/16/2005 Lengthy telephone call to opposing counsel (left detailed message) regarding discovery; prepared memorandum to file	0.50	57.50
8/17/2005 Telephone message from opposing counsel; telephone conference with opposing counsel's office regarding discovery; prepared memorandum to file	0.50	57.50
8/23/2005 Review pleadings to ascertain list of attorneys now in the case; organize third-party pleadings; organize third-party discovery	0.60	69.00
8/24/2005 Telephone call to attorney Edward Kopelson to ascertain the party he represents (Robert Levine); prepare memorandum to file	0.40	46.00
Organized parties & counsel names for file; Reviewing documents regarding same	0.50	57.50
8/25/2005 Pacer Research: Reviewing submitted documents by Court Tasks	0.50	57.50
8/29/2005 Docketing trial orders/scheduling set by Court for case and/or setting up various for trial	0.80	92.00
8/30/2005 Pacer Research for filing new documents; Reviewing documents; organized file	0.75	86.25

	<u>Hours</u>	<u>Amount</u>
9/23/2005 Pacer Research: Reviewing Revised Order; file	0.25	28.75
10/17/2005 Paralegal file maintenance	0.40	46.00
Four telephone calls to judge's chambers and to case manager regarding late advisement of a hearing next Friday; attempt to reschedule or get permission to appear in person; telephone calls to local counsel regarding appearing in person	0.50	57.50
10/19/2005 Telephone calls (2) with case manager regarding appearing in person; preparation of three memorandums to file, regarding appearances, regarding issues; telephone call to local counsel advising we will be appearing telephonically; preparation of letter to local counsel	0.80	92.00
1/4/2006 Reviewing Motions; Assembled file	0.20	23.00
1/10/2006 Reviewing file regarding Motion to Dismiss; Left message for Clerk regarding ruling on Motion	0.20	23.00
1/12/2006 Spoke with Clerk regarding status of Motion to Dismiss	0.10	11.50
2/14/2006 Reviewing PACER; Correspondence to file	0.10	11.50
2/28/2006 Reviewed documents in PACER of what has been filed	0.10	11.50
3/1/2006 Organized file	0.20	23.00
3/8/2006 Filed Court documents	0.10	11.50
6/26/2006 Paralegal file maintenance	0.40	46.00
7/12/2006 Paralegal check and update distribution list and each opposing client's attorney; file upkeep and review	0.40	46.00
11/21/2006 Docketing/tabling, copying conveying discovery via e-mail / U.S. Mail to/from Defendants	0.30	34.50
11/28/2006 Paralegal conveying via facsimile and/or U.S. Mail and/or e-mail to all parties; update file.	0.50	57.50
3/7/2007 Paralegal file upkeep -- partial separation into volumes and upkeep	0.50	57.50
3/29/2007 Paralegal docketing trial orders/scheduling set by Court for case and/or setting up various for trial and/or mediation	0.20	23.00
3/30/2007 Troubleshooting missing documents -- filing error regarding unable to download recent court order	0.20	23.00
4/2/2007 Troubleshooting with court regarding difficulty downloading another court order -- order dated 4-2-07.	0.10	11.50
Paralegal docketing trial orders/scheduling set by Court for case and/or setting up various for trial and/or mediation	0.20	23.00

	<u>Hours</u>	<u>Amount</u>
4/2/2007 Scanning copy of Courtroom Deputy's letter; scanning of settlement procedures of Judge Pittman; Preparation of letter to opposing counsels advising of the new settlement conference date; updating file	0.60	69.00
4/6/2007 Various phone calls regarding cancelling deposition of April 11, 2007 of corporate representative of Trump International Hotel and Tower Condominium and resetting for April 25, 2007; Paralegal docketing trial orders/scheduling	0.80	92.00
Paralegal preparation of letter to opposing counsel's assistant; Paralegal conveying via facsimile and/or U.S. Mail and/or e-mail to all parties	0.50	57.50
4/9/2007 Paralegal docketing trial orders/scheduling set by Court for case and/or setting up various for trial and/or mediation -- proofing upcoming orders and judicial requirements v. physical and computer calendar	0.60	69.00
4/11/2007 Paralegal docketing trial orders/scheduling set by Court for case and/or setting up various for trial and/or mediation	0.30	34.50
6/5/2007 Preparation of e-mail to opposing counsel Jordan Merson with copy to attorney Gregory Begg; attorney Brian Blair, and attorney S. Jeanine Conley, regarding Condominium's expert report and expert's resume; telephone conference with attorney Lawrence Fuller (who is out of town); preparation of memorandum to file	0.80	92.00
6/14/2007 Paralegal -- Preparation and conveying of e-mail to opposing counsels Gregory Begg; Jordan Merson; Brian Blair; docketing; preparation of memorandum to file; preparation of group e-mail to opposing counsels, co-counsel, plaintiff, regarding deposition date availability of Plaintiff	0.40	46.00
6/27/2007 Telephone conference with court reporter regarding arranging deposition of Acting General Manager of Trump International Hotel and Tower, Suzie Mills, at court reporter's in New York; preparation of two letters to Mr. Begg, Mr. Blair, Mr. Merson; preparation of letter to Clara of CE Reporting; Docketing; Preparation of memorandum to file	0.50	57.50
7/2/2007 Telephone call to Courtroom Deputy Daniel Ortiz; left detailed message regarding obtaining a hearing on motion to amend complaint and to compel discovery; telephone conference to law clerk Brian Rooder regarding obtaining a hearing on motion to amend complaint and compel discovery; reviewing e-mail from clerk of court regarding re-filing of document; file upkeep; file update; preparation of memoranda to file	0.50	57.50
8/1/2007 Paralegal -- telephone conference with Mr. Begg's office to reschedule Settlement Conference; telephone conference with Mr. Blair's office to reschedule Settlement Conference; preparation of Memorandum to file; preparation of letter to opposing counsels	0.60	69.00
Paralegal -- Two additional telephone conferences; preparation of two letters, regarding rescheduling of Settlement Conference.	0.50	57.50

	<u>Hours</u>	<u>Amount</u>
8/2/2007 Paralegal -- Two additional conversations with Rita Childers of opposing counsel Mr. Begg's office regarding the need to bring clients to the Settlement Conference; research Rules, Judge Pittman's requirements; scan rules; e-mail to Ms. Childers	0.70	80.50
Paralegal -- continuing attempting to set Settlement Conference at a time suitable to all attorneys and all clients; additional telephone calls to opposing counsels' assistants; preparation of e-mail; telephone call to Judge's chambers to advise unable to set on dates provided by judge; discuss future possible dates; telephone call with client; conference with attorney; preparation of memorandum to file; docketing; update file	0.60	69.00
8/3/2007 Preparation of letter to all parties regarding Settlement Conference; left detailed message with Courtroom Deputy Daniel Ortiz; preparation of memorandum to file	0.50	57.50
Paralegal -- prepare facsimile letter to Magistrate Judge Pittman with a copy to all parties; telephone conference with Judge Pittman's chambers regarding setting of Settlement Conference; prepare memorandum to file; docket	0.40	46.00
8/8/2007 Telephone conference to Judge Pittman's chambers regarding setting Settlement Conference for September 11, 2007 -- also left detailed message for Daniel Ortiz; preparation of memorandum to file and to docket	0.30	34.50
Paralegal -- two telephone conferences with client Peter Spalluto regarding settlement; telephone conference with Peter Spalluto regarding special arrangements he must make for plane travel; preparation of memorandum to file; file update	0.50	57.50
9/7/2007 Preparation of letter with attachment to The Hon. Henry Pittman per Court requirements, regarding Settlement Conference of 9-11-07 at 10:00 am; preparation of letter with attachment to opposing counsels Gregory Begg and Jordan Merson regarding settlement; preparation of facsimile to The Hon. Henry Pittman	0.80	92.00
9/10/2007 Paralegal -- two telephone conferences -- calls from Mr. Ortiz of Judge Pittman's chambers regarding Order setting Settlement Conference for April, 2007, which mentioned only Plaintiff and Defendant may attend; research past orders and past correspondence via computer	0.60	69.00
9/27/2007 Paralegal -- research/download information on Judge Sullivan; updating file regarding information regarding Judge Sullivan replacing Judge Karas; prepare material for attorney regarding Judge Sullivan's preferences -- telephone conversation with Ms. Levine of Judge Sullivan's chambers regarding getting a Status Conference regarding discovery completed	0.80	92.00
10/3/2007 Paralegal -- scan material for attorney Kopelson; prepare letter to attorney Kopelson (other Trump case)	0.60	69.00

	<u>Hours</u>	<u>Amount</u>
10/10/2007 Paralegal -- Telephone conference with attorney Jeanine Conley regarding transcript of expert Andrew Weiss; telephone conference with attorney Gregory Begg's assistant Rita, regarding transcript of expert Andrew Weiss; updating file and file maintenance; updating docketing	1.30	149.50
Paralegal -- telephone call to Judge Pitman's deputy Daniel Ortiz; preparation of detailed letter to Daniel Ortiz; preparation of letters to opposing counsels; research in pleadings clip and in Pacer for attorney Lawrence Fuller	1.50	172.50
11/13/2007 Docketing; preparing memorandum to file; update file	0.60	69.00
11/15/2007 Telephone message to attorney Jeanine Conley regarding hearing, tomorrow 11-16-07. Telephone conference with Ms. Conley's assistant regarding hearing. Docketing. Update file.	0.60	69.00
11/30/2007 Paralegal -- detailed telephone messages to opposing attorney Gregory Begg and to his assistant Rita Childer regarding obtaining executed Consent Decree from their client; preparation of memorandum to file	0.30	34.50
12/4/2007 Paralegal -- scan Consent Decree executed by all parties, proposed Order; telephone conference with Clerk of Orders and Judgments; file Consent Decree and proposed Order with Clerk of Orders and Judgments; telephone message (detailed) to Daniel Ortiz, Judge Pitman's deputy; message to Judge Ortiz's Clerk. Jim, advising Consent Decree (between Plaintiffs and Defendant only) and proposed Order were filed today	0.90	103.50
12/7/2008 Telephone calls (left 3 detailed messages) to co-counsel Mario Mikelinich; preparation of memorandum to file	0.50	57.50
SUBTOTAL:	[31.00	3,565.00]
For professional services rendered	584.50	\$233,927.50
Additional Charges :		
Client Expense _____		
9/2/2004 Re-Inspection Fee(s) to disability group		750.00
Filing Fees - Ck.#13291		150.00
Expert Fee(s) Herb Neff		3,150.00
9/20/2004 Courier Service		16.99
9/27/2004 Telephone Charges		0.32
9/30/2004 Postage		2.12

	<u>Amount</u>
9/30/2004 Photocopies	34.20
10/28/2004 Telephone Charges	8.31
10/31/2004 Photocopies	34.20
11/16/2004 Service of Process - Ck.#13756	25.00
11/19/2004 Service of Process - Ck.#13756	30.00
11/26/2004 Telephone Charges	2.45
12/17/2004 Service of Process - Ck.#13593	85.00
12/27/2004 Telephone Charges	1.17
12/31/2004 Postage	5.25
Photocopies	20.25
1/27/2005 Telephone Charges	3.41
1/31/2005 Postage	2.58
Photocopies	32.40
2/23/2005 Faxing Long-Distance Chrg.	2.00
2/24/2005 Telephone Charges	1.97
2/28/2005 Postage	1.11
Photocopies	1.80
3/7/2005 Faxing Long-Distance Chrg. - Domestic	6.00
Faxing Long-Distance Chrg. - Domestic	2.00
3/31/2005 Telephone Charges	2.93
Photocopies	4.05
4/26/2005 Telephone Charges	8.60
4/28/2005 Faxing Long-Distance Chrg.	2.00
4/29/2005 Faxing Long-Distance Chrg.	2.00
4/30/2005 Photocopies	26.10
5/10/2005 Faxing Long-Distance Chrg.	2.00

	<u>Amount</u>
5/18/2005 Faxing Long-Distance Chrg.	2.00
5/31/2005 Telephone Charges	1.57
Postage	5.90
Photocopies	17.55
6/24/2005 Telephone Charges	0.39
6/30/2005 Photocopies	17.55
8/31/2005 Postage	14.25
Photocopies	17.10
Telephone Charges	0.75
9/26/2005 Telephone Charges	1.76
10/31/2005 Photocopies	3.60
Telephone Charges	16.21
11/29/2005 Telephone Charges	1.91
11/30/2005 Photocopies	3.60
1/31/2006 Telephone Charges	0.33
5/31/2006 Telephone Charges	0.23
Postage	8.78
Photocopies	4.50
6/30/2006 Postage	0.39
Photocopies	18.45
7/11/2006 Photocopies	2.25
7/14/2006 Photocopies	11.25
7/17/2006 Photocopies	21.60
7/18/2006 Photocopies	18.90
7/31/2006 Telephone Charges	0.80
Postage	5.40

	<u>Amount</u>
8/31/2006 Telephone Charges	2.39
9/30/2006 Telephone Charges	6.47
10/4/2006 Travel: Airfare and Ground Transportation	450.00
Travel: Lodging, Meal(s) & Tip(s)	550.00
10/30/2006 Telephone Charges	0.26
10/31/2006 Photocopies	50.40
11/2/2006 Photocopies	5.40
Photocopies	12.15
11/20/2006 Photocopies	70.65
11/30/2006 Telephone Charges	12.01
Postage	15.72
Photocopies	49.50
12/13/2006 Photocopies	3.60
12/29/2006 Telephone Charges	4.50
12/31/2006 Postage	1.26
Photocopies	73.35
1/2/2007 Photocopies(JL)	2.70
1/29/2007 Telephone Charges	0.39
2/28/2007 Postage	6.09
Photocopies	55.35
Telephone Charges	12.10
3/15/2007 Faxing Long-Distance Chrg.	10.00
3/31/2007 Postage	1.56
Photocopies	17.10
Telephone Charges	1.48
4/2/2007 Photocopies	2.25

	<u>Amount</u>
4/10/2007 Travel: Meal(s) & Tip(s), Airfare & Ground Transportation for inspection in New York City (expert)	533.00
4/18/2007 Travel: Lodging, Meal(s) & Tip(s) , Airfare & ground transportation of attorney	851.49
4/25/2007 Court Reporter Deposition of Mr Levchuck	466.00
4/30/2007 Telephone Charges	21.74
Postage	3.15
Photocopies	30.15
5/4/2007 Expert Fee(s) Herb Neff	4,200.00
5/14/2007 Travel: Lodging, Meal(s) & Tip(s), Airfare, Ground transportation, Parking for inspection in New York City	742.00
5/29/2007 Telephone Charges	2.50
5/31/2007 Photocopies	50.40
6/1/2007 Postage	0.63
6/21/2007 Filing Fees - Ck.#15332 Pro Hac Vice for Thomas B. Bacon and Pro Hac Vice for John P. Fuller	50.00
6/30/2007 Photocopies	23.85
Telephone Charges	0.90
Long Distance Calls	17.60
7/10/2007 Travel: Airfare for Attorney and Expert	337.60
7/13/2007 Photocopies	0.45
7/19/2007 Faxing Long-Distance Chrg.	12.00
7/24/2007 Faxing Long-Distance Chrg.	18.00
Faxing Long-Distance Chrg.	6.00
7/25/2007 Travel: Airfare, Meal(s) & Tip(s) for Attorney for depositions in New York City of Ms Mills and Mr Spaliuto	953.00
Court Reporter Deposition of Ms Mills	475.15
7/31/2007 Postage	0.41
8/1/2007 Photocopies	54.45

	<u>Amount</u>
8/3/2007 Faxing Long-Distance Chrg.	6.00
8/22/2007 Faxing Long-Distance Chrg.	10.00
Faxing Long-Distance Chrg.	30.00
8/30/2007 Travel: Lodging, Meal(s) & Tip(s), Airfare and ground transportation incurred in New York City during deposition scheduled for 8/29/07, 8/30/07 & 8/31/07 of Baez, Black, Williams and Weiss	1,800.00
Travel: Airfare and ground transportation expenses incurred by expert for deposition on 8/30/07	450.00
8/31/2007 Photocopies	180.45
Telephone Charges	189.40
9/10/2007 Travel: Meal(s) & Tip(s), Ground Transportation	300.00
9/30/2007 Postage	1.99
Photocopies	2.25
Photocopies	267.30
10/2/2007 Faxing Long-Distance Chrg.	48.00
10/16/2007 Long Distance Calls	34.00
10/31/2007 Postage	0.41
Photocopies	0.90
Photocopies	36.00
Long Distance Calls	94.60
11/20/2007 Faxing Long-Distance Chrg.	30.00
11/30/2007 Photocopies	51.75
Long Distance Calls	84.20
12/17/2007 Photocopies	54.00
12/19/2007 Expert Fee(s) Herb Neff	4,287.50
SUBTOTAL:	[22,839.13]
Total costs	<u>\$22,839.13</u>

	<u>Amount</u>
Total amount of this bill	<u>\$256,766.63</u>
Balance due	<u><u>\$256,766.63</u></u>